REMARKS

Applicants have reviewed the Office Action dated October 6, 2010, and the references cited therein. Claims 1-18 were previously pending. All claims currently stand rejected under 35 U.S.C. §103(a) over ViewSonic (Publication A-CD-ViewPad 1000-1, 2001) in view of Wonderware's FactorySuite program as described in the FactorySuite InTouch User's Guide, June 2001 (InTouch), and Rammler US App. Pub. No. 2003/0105535 (Rammler).

Applicants have submitted the present amendments to the claims, and in particular independent claim 1, to clarify and more definitively distinguish Applicants' invention from the prior art upon which the currently pending rejections are based. In particular, claim 1 has been amended to define the particular relationships between the application programs and tablet PC interface services. Moreover, claim 1 has been further amended to recite particular types of tablet PC interface services that are supported in the claimed tablet PC system. Support for these further clarifications can be found in the description of FIG. 2 (e.g., Pen Input Panel & Annotation services), FIG. 4 (Pen Input Panel enabled application) and FIG. 5 (e.g., Annotation enabled application).

Applicants traverse the current rejection of claims 1-18 and request favorable reconsideration of the previous rejection in view of Applicants' amendments and remarks.

Please charge any fee deficiencies to Deposit Account No. 12-1216.

Applicants' Specific Grounds for Traversing the Obviousness Rejection of Claims 1-18

Applicants traverse the rejection of claims 1-18 as obvious over the combined teachings of ViewSonic, InTouch and Rammler since the Office Action does not establish a *prima facie* case of obviousness with regard to the presently pending claims.

A. Applicants' Claimed Invention

Applicants' invention recited in **claim 1** is directed to a tablet personal computer system (see, tablet PCs 100 and page 6, lines 18-21) and software (see, FIG. 2 and page 7, line 22 to page 8, line 30) facilitating performing a variety of design, supervisory and/or data management tasks associated with industrial processes. The tablet PC system includes a human-machine interface, including a touch-sensitive display region, integrated into a tablet personal computer. See, page 12, lines 13-23. The claimed tablet computer system also includes a wireless communication resource. See, page 6, lines 22-29. The table personal computer system software includes a set of one or more application programs relating to supervisory control of industrial processes. See, Applications 230 of FIG. 2, and page 8, lines 19-30.

Furthermore, in accordance with the invention recited in claim 1, the application programs 230 interact with a user via a set of tablet PC interface services incorporated into individual ones of the application programs. *Applicants note that "incorporated into individual ones of the application programs" is carried out, in the illustrative embodiment, through software objects provided in an industrial application program developer kit.* The term "incorporated into" includes, as shown in FIG. 2 and the associated written description of the "common services 220", an executable program structure arrangement wherein the application programs incorporate services provided in the form of objects containing executable instructions that are invoked during the operation of the industrial application programs. In accordance with the current amendments to claim 1, the tablet PC interface services specifically include "Pen Input panel" and "Annotation" services. See, common services 220 in FIG. 2 and page 8, lines 8-18. Thus, in accordance with the presently claimed invention, a service approach is utilized that facilitates adapting the aforementioned industrial process applications to a tablet PC's extended HMI functionality by the addition of certain pen-based tablet PC services. The industrial process supervisory applications are provided, through incorporation of the pen-based tablet PC services, with new functionality that exploits the extended capabilities of the tablet PC hardware and tablet PC operating system.

B. The Prior Art

The ViewSonic ViewPad does indeed disclose a tablet PC that was known at the time of the invention. The ViewPad includes hardware and drivers supporting use of a touch-sensitive graphical human machine interface.

The InTouch human-machine interface application reference discloses a prior art version of Wonderware's InTouch® HMI application that was indeed known at the time of the invention. The InTouch reference is an example of a supervisory control application program. The prior art InTouch® program was capable of running on the Windows CE platform. **The prior art version of the InTouch® application did not incorporate the presently claimed "set of table PC interface services."**

As noted in the Background section of Applicants' application, the InTouch® application generally operated on a stationary computer. The InTouch® application did not incorporate the claimed "set of tablet PC interface services" that facilitates interaction between a USER and the Tablet PC's human-machine interface. **Thus, the prior art InTouch application did not incorporate the claimed pen-based tablet PC interfaces that exploit the extended HMI capabilities of tablet PCs.**

Rammler describes a palm type computer having touch screen controls for exercising supervisory control over a unit. Similar to the description of "Touch Links" in the "InTouch" reference, Rammler describes augmenting a supervisory control HMI by providing a "touch" I/O channel that allows manipulation of a variety of touch-based HMI control objects (e.g., buttons, sliders, etc.).

Thus, the known InTouch and Rammler systems introduce a "touch" I/O channel for users to select control elements that were previously selected using a mouse/pointer. Thus, rather than providing a new *service*, InTouch and Rammler disclose exploiting touch screen interfaces by introducing support for a new (touch) *I/O channel*. **Nowhere does InTouch or Rammler disclose any application functionality that exploits electronic pen technology in the form of either: (1) a pen input panel, or (2) screen image annotation.**

C. The Combined Prior Art Teachings Do No Render Applicants' Invention Obvious

Applicants traverse the rejection of **claim 1**, in view of Applicants' amendments, since none of the cited references discloses either of the two specifically recited pen-based tablet PC interface services. Instead, the combined teachings, at best, disclose providing a touch-based I/O channel capability enabling users to forgo use of a mouse/pointer selection mechanism when asserting supervisory control over a process (e.g., plant equipment). In the most recent amendments, Applicants have recited service-based extensions to application programs that go beyond merely adding a new mode for receiving user input (InTouch and Rammler) and instead provide entire new services (pen input panel & annotation) that exploit a pen-based I/O channel.

Applicants note that ViewSonic does indeed disclose an electronic pen. However, combining ViewSonic's disclosure of the electronic pen I/O channel with InTouch and Rammler merely results in modifying these two palm-based systems to use an electronic pen to make selections. Notwithstanding the existence of an electronic pen in ViewSonic, there is no teaching in either InTouch or Rammler regarding the desirability of using ViewSonic's pen beyond its use to manipulate control objects (e.g., buttons, sliders, etc). None of the cited prior art references provides any teaching regarding Applicants' specifically recited electronic pen-based services (i.e., pen input panel & screen image annotation on a supervisory control application program for industrial processes).

Given the absence of any teaching regarding either of the specifically recited pen-based tablet PC interface services, the claimed invention cannot be rendered obvious by the teachings of ViewSonic, InTouch and Rammler.

Applicants note that the above argument applies as well to the rejection of dependent **claims 4 and 5** which relate to the two specifically recited tablet PC interface services recited in claim 1.

Applicants' claimed invention is directed to a "services" oriented architecture wherein applications incorporate a "set of tablet PC interface services" including the specifically identified "pen input panel" and "annotation" services. In contrast, the combined teachings of ViewSonic/PenOffice® and the InTouch and Rammler references suggests using ViewSonic's electronic pen to enable users to select/manipulate buttons, sliders, etc. The combined teachings would not have suggested modifying InTouch and Rammler to include either of the specifically recited pen-based tablet PC interface services.

Conclusion

If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,

Mark Joy, Reg. No. 35,562
LEYDIG, VOIT & MAYER, LTD.
Two Prudential Plaza, Suite 4900
180 North Stetson Avenue
Chicago, Illinois 60601-6731
(312) 616-5600 (telephone)
(312) 616-5700 (facsimile)

Date: April 6, 2011